

**FILED**

IN THE UNITED STATES DISTRICT COURT  
 UNITED STATES DISTRICT COURT  
 ALBUQUERQUE, NEW MEXICO  
 FOR THE DISTRICT OF NEW MEXICO

APR 14 2021

UNITED STATES OF AMERICA,

Plaintiff,

vs.

**JORGE DOMINGUEZ** and  
**LUIS MARISCAL-LOPEZ, AKA.**  
**LUIS MARISOL-LOPEZ, AKA.**  
**LUIS LOPEZ.**

Defendants.

MITCHELL R. ELFERS  
 CRIMINAL NO. 21 CR 524 RLR  
 Count 1: 18 U.S.C. § 1201(c): Conspiracy  
 to Commit Kidnapping; and  
 Count 2: 18 U.S.C. §1201(a)(1):  
 Kidnapping Resulting in Death; 18  
 U.S.C. § 2: Aiding and Abetting.

INDICTMENT

The Grand Jury charges:

Count 1

From on or about January 14, 2018, and continuing to on or about January 15, 2018, in Santa Fe County, in the District of New Mexico and elsewhere, the defendants, **JORGE DOMINGUEZ** and **LUIS MARISCAL-LOPEZ**, unlawfully, knowingly and intentionally combined, conspired, confederated, agreed, and acted interdependently with CRYSTAL RAMOS and J.T. to seize, confine, inveigle, decoy, kidnap, abduct, and carry away Jane Doe for some purpose and benefit, and in committing and in furtherance of the commission of the offense, cell phones and Facebook Messenger were used, as a means, facility, and instrumentality of interstate and foreign commerce.

Overt Acts

In furtherance of the conspiracy, and to effect the object thereof, the following overt acts, among others, were committed in the District of New Mexico:

Overt Act 1

From on or about January 14, 2018, and continuing to on or about January 15, 2018, CRYSTAL RAMOS, J.T., **JORGE DOMINGUEZ**, and **LUIS MARICAL-LOPEZ** agreed to kidnap, assault, and kill Jane Doe.

Overt Act 2

From on or about January 14, 2018, and continuing to on or about January 15, 2018, CRYSTAL RAMOS and J.T. inveigled Jane Doe to accompany them by telling her they were no longer mad at her and RAMOS' boyfriend left her.

Overt Act 3

From on or about January 14, 2018, and continuing to on or about January 15, 2018, CRYSTAL RAMOS and J.T. inveigled Jane Doe to leave Buffalo Thunder Casino and join them in RAMOS' vehicle to return to their home at 302 McCracken Ln., Santa Cruz, NM.

Overt Act 4

From on or about January 14, 2018, and continuing to on or about January 15, 2018, **JORGE DOMINGUEZ** and **LUIS MARISCAL-LOPEZ**, lay in wait at 302 McCracken Ln., Santa Cruz, NM, for Jane Doe to arrive with CRYSTAL RAMOS and J.T.

Overt Act 5

From on or about January 14, 2018, and continuing to on or about January 15, 2018, when Jane Doe entered the home CRYSTAL RAMOS, J.T., **JORGE DOMINGUEZ**, and **LUIS MARISCAL-LOPEZ** assaulted Jane Doe.

Overt Act 6

From on or about January 14, 2018, and continuing to on or about January 15, 2018, CRYSTAL RAMOS, J.T., **JORGE DOMINGUEZ**, and **LUIS MARISCAL-LOPEZ** confined Jane Doe in a bedroom.

Overt Act 7

From on or about January 14, 2018, and continuing to on or about January 15, 2018, CRYSTAL RAMOS, J.T., **JORGE DOMINGUEZ**, and **LUIS MARISCAL-LOPEZ** assaulted Jane Doe with deadly weapons while she remained confined.

Overt Act 8

On or about January 15, 2018, after Jane Doe died, CRYSTAL RAMOS, J.T., **JORGE DOMINGUEZ**, and **LUIS MARISCAL-LOPEZ** made continuing efforts from that day, with the assistance of others, to conceal her remains and other evidence related to the kidnapping and death of Jane Doe from the detection of law enforcement.

In violation of 18 U.S.C. § 1201(c).

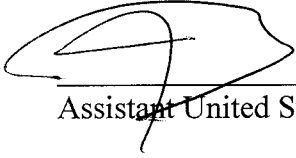
Count 2

From on or about January 14, 2018, and continuing to on or about January 15, 2018, in Santa Fe County, in the District of New Mexico, the defendants, **JORGE DOMINGUEZ** and **LUIS MARISCAL-LOPEZ**, did unlawfully, knowingly and willfully kidnap, and attempt to kidnap, abduct, seize, confine, inveigle, and carry away Jane Doe, for some purpose and benefit, and in committing and in furtherance of the commission of the offense, a cell phone and Facebook Messenger were used as a means, facility, and instrumentality of interstate and foreign commerce resulting in the death of Jane Doe.

In violation of 18 U.S.C. §§ 1201(a)(1) and 2.

A TRUE BILL:

151  
FOREPERSON OF THE GRAND JURY



Assistant United States Attorney